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SUBJECT: ASSESSMENT OF UAE TERRORIST FINANCING ENVIRONMENT

REF: A. SECSTATE 132693

- [1](#)B. 2005 ABU DHABI 3565
- [1](#)C. ABU DHABI 409
- [1](#)D. 2005 ABU DHABI 4468
- [1](#)E. 2005 ABU DHABI 4541
- [1](#)F. 2003 ABU DHABI 3476
- [1](#)G. 2004 ABU DHABI 1149
- [1](#)H. ABU DHABI 2633

Classified By: Ambassador Michele J. Sison for reasons 1.5 b and d.

[1](#)1. (SBU) Summary. In response to ref A, Embassy's country team provides the following assessment of the terrorist/insurgent finance operating environment in the UAE. Responses are keyed to ref tel, to the extent possible. End summary.

Legal Regime

[1](#)2. (SBU) Question. What laws in your host country criminalize money laundering, terrorist financing and

insurgent financing? What are the penalties for violations of counter-terrorist/insurgent financing laws?

(SBU) Answer. The two laws that serve as the foundation for the UAE's anti-money laundering (AML) and counter terror finance (CTF) efforts are the Anti-Money Laundering Law (Law No. 4/2002), and the Counterterrorism Law (Law No. 1/2004). Neither of these laws specifically addresses the issue of insurgent financing, but the language in the Counterterrorism Law can be interpreted to apply to insurgent financiers. Article 2 defines terrorism as "every act or omission where the offender commits himself to execute a criminal design, individually or collectively, with intention to cause terror between people or terrifying them, if the same causes breach of the public order or endangering the safety and security of the society or injuring persons or exposing their lives, liberties, security to danger (sic)..." Article 12 specifically criminalizes terrorist financing, "Whoever gains, provides, collects, carries or transfers property, directly or indirectly, with intention to be used or knows they are going to be used, in whole or in part, to financing any act terrorist acts provided in this Decree by Law within the State or abroad, whether the said act occurred or non occurred, shall be punished with life or provisional imprisonment. And shall forfeit the property or possession subject of the offence and proceeds thereof or property equivalent to their value, if transferred or substituted in whole or in part of mixed with other property, gained from legal sources (sic)." Additionally, Article 13 delineates the same penalties for any individual carrying, depositing, or transferring money or property with the intention of said funds being used to finance terrorism.

13. (C) Question. What is the implementing mechanism for UNSCR 1267, UNSCR 1617 and related UN resolutions? What legislation implements UNSCR 1483 and UNSCR 1518?

(C) Answer. The Counterterrorism Law is also the implementing mechanism for all UN Security Council Resolutions relating to combating terrorism, although it does not specifically identify the resolutions. Article 37 states that the UAE Counter Terrorism Committee is responsible for "follow(ing) up and enforc(ing) Security Council resolutions on combating terrorism and other international related resolutions in coordination with concerned bodies at the State." Central Bank Governor Sultan Nasser Al-Suweidi has told Embassy officials that he pushed to have the law mention enforcing UN resolutions, in order to give him the authority to freeze accounts of persons designated by UNSCR 1267. Although the UAE does not have a law specifically implementing UNSCR 1483 or UNSCR 1518, which impose economic sanctions against designated officials of the former Iraqi regime, as a matter of course the Central Bank Governor freezes the assets of all individuals officially designated by the UN Security Council.

14. (C) Question. What are the implementing mechanisms that bring the host country into compliance with the financial action task force's 40 9 recommendations? Has the host country joined the MENA-FATF? Has the host government established a financial intelligence unit capable of being accepted into the Egmont Group?

(C) Answer. Administrative Regulation No. 24/2000 implements the Financial Action Task Force (FATF) 40 9 recommendations on money laundering and terrorist financing that relate to duties and responsibilities of financial institutions. Pursuant to the recommendations, banks and financial institutions (including the UAE's 106 money service businesses - MSBs) must maintain records of their customers (including copies of identification) and transactions, for as long as an account remains open and for five years after its closure, for the purpose of reconstructing transactions. In concurrence with special recommendation (SR) VII, MSBs must verify identity and maintain transaction details (including name and address of originator and beneficiary) for all wire transactions over \$545 (one of the lowest thresholds in the world). The regulation also outlines types of transactions that could constitute money laundering and requires financial institutions to immediately report them to the Central Bank's

financial intelligence unit, the Anti-Money Laundering and Suspicious Cases Unit (AMLSCU). The AMLSCU has been a member of the Egmont Group since 2002, and the UAE is one of the founding members of the MENA-FATF.

(C) In compliance with SR VI, the Central Bank issued a regulation in 2002 requiring hawala dealers (hawaladars) to register with the Central Bank. As of August 16, 2005, the Central Bank had issued 190 licenses to hawaladars. These registered hawaladars are required to submit records of every incoming and outgoing remittance to the Central Bank every quarter, and they are required to immediately report any suspicious transaction to the AMLSCU. However, Embassy notes that this regulation is largely voluntary -- there are no sanctions for non-compliance imposed on hawaladars who do not register with the Central Bank.

15. (SBU) Question. What other laws, regulations or legal procedures have been enacted to combat terrorist/insurgent financing?

(SBU) Answer. On February 13, 2006, the UAE issued Law No. 2 of 2006 on Cyber Crime. Article 21 of this law states that anyone convicted of "setting up a website or publishing information for a terrorist group with intent to...promote their ideologies and finance their activities...shall be sentenced to no more than five years in jail." Additionally, Article 19 criminalizes money laundering via "internet or other cyber means."

16. (C) Question. Please describe the host country's laws and/or regulations covering freezing of assets, blocking of transactions and asset forfeiture/seizure.

(SBU) Answer. Both the Anti-Money Laundering law and the Counterterrorism Law authorize the freezing and confiscation of assets, and they authorize forfeiture of assets if the suspect is convicted. Article 31 of the Counterterrorism Law gives the overall authority to seize or freeze assets to the Attorney General's office that has jurisdiction over the case. (Note: Although the federal penal code is applied throughout the country, the UAE has three judicial systems -- federal, Emirate of Dubai, and Emirate of Ras al Khaimah -- and thus three separate Attorney General offices. End note.) This article authorizes the Attorney General's office to order the investigation of activities that the Attorney General has "sufficient evidence to believe" are related to the funding or committing of a terror activity stated in the law, and the law stipulates that assets may remain frozen as long as the law enforcement case is pending. Article 32 of the Counterterrorism law authorizes the Central Bank Governor to freeze accounts for up to seven days if he suspects the funds will be used to fund or commit any of the crimes listed in the law, but it stipulates that the Central Bank must provide evidence to the Attorney General for prosecution in order to maintain the freeze beyond seven days.

(C) In practice, the Central Bank holds freezes longer than seven days, even if no evidence has been provided to the Attorney General. The Central Bank Governor, Sultan Nasser Al Suwaidi, is proactive and would rather keep accounts frozen extra-judicially than to allow individuals access to suspect funds. However, Central Bank officials have expressed frustration when the USG has asked the Bank to

freeze funds but has not provided evidence that could be used in a court of law. Central Bank officials have told us on multiple occasions they are concerned that courts could force them to release frozen assets based on a lack of evidence, which would seriously damage the credibility and effectiveness of the Central Bank.

17. (C) Question. Please describe the host country's reporting regime for suspicious financial activity and/or currency transactions.

(SBU) Answer. Central Bank Regulation 24/2000 outlines the reporting regime for financial institutions. This regulation

requires banks, MSBs, finance companies, and any other financial institutions operating in the UAE to follow strict "Know Your Customer" guidelines. Additionally, financial institutions must verify the customer's identity and maintain transaction details (including name and address of originator and beneficiary) for all MSB transactions over \$545 and for all non-account holder bank transactions over \$10,900. However, there is no minimum threshold for a transaction to be reported to the Central Bank via a "suspicious transaction report" (STR). Instead, the regulation states that financial institutions must report to the AMLSCU any "unusual" or suspected money laundering transaction no matter the amount of the transfer.

(C) The Central Bank Governor has repeatedly told USG officials that he stresses to financial institutions the importance of "quality" STRs, vice "quantity." Between December 2000 and November 2005, the AMLSCU had received 3031 STRs (of which, only 1105 came from banks and 170 from MSBs, with the rest being referred to the AMLSCU by "other UAE authorities" - i.e. the security services). As a data point for comparison, the UAE Exchange (one of the UAE's largest MSBs), processes 25,000 transactions per day. The head of Standard Chartered's Compliance office told Econoff that "the AMLSCU does not have the capacity to be inundated with STRs, so we ensure that every single STR we send is absolutely, and unquestionably, suspicious." He also noted that Standard Chartered's compliance office conducts its own vigorous review of all transactions. He said that Standard Chartered maintains all of the required paperwork and transaction records at the bank so that the Central Bank's examiners can examine them at any time, and he said that the compliance officers at other major UAE banks (such as Citibank, Lloyds, ABN-AMRO, and HSBC) do the same. Technically, the Central Bank has the authority to impose administrative penalties on financial institutions that fail to report suspicious transactions, but since there is no minimum amount that is required to report, whether a given transaction should have generated an STR is subjective -- thus making it difficult for the Central Bank to claim that a financial institution was negligent in failing to report any given transaction.

(C) The AMLSCU is an administrative, not an investigative unit. If a person or business comes under suspicion, the AMLSCU can request the individual's or business' financial records from the UAE's 46 banks and 110 MSBs. The AMSLCU will then analyze data based on the financial records and data in the AMLSCU's STR database. The AMLSCU may then recommend that the Central Bank Governor either a) freeze the accounts, b) refer the case to law enforcement or the security services for investigation or further action, or c) take no further action.

18. (SBU) Question. Please describe the host country's oversight of cross-border transactions, with particular attention to physical transfers of currency. What laws and regulations, if any, require declarations of cash? What is the minimum amount of cash that individuals are required to declare?

(SBU) Answer. There is no limit for how much cash can be imported into the UAE; however in 2002, the Central Bank established a cash declaration requirement of 40,000 dirhams (approximately \$10,900). Travelers are supposed to fill out a declaration form and provide it to the customs authorities. The form requests the traveler identify the purpose of the funds and provide his/her identification, contact, and travel details. According to the cash import regulation, customs officers have the authority to seize undeclared cash. Cash and travelers checks coming through shipments, postal parcels, or courier services are also subject to the declaration requirement.

Implementation

19. (S/NF) Question. Please describe in general terms the host country's level of administration and enforcement of

counter-terrorist/insurgent financing measures. What has the host country done to impede or disrupt mechanisms and networks of terrorist/insurgent finance? What is the host country's de facto policy toward inhibiting support?

(S) Answer. The UAE -- and especially the Central Bank -- recognizes it would be detrimental to the UAE's reputation for terrorists or criminals to exploit the UAE's financial system. As such, the Central Bank has implemented a number of laws and regulations to try to prevent the misuse of its financial sector, and widely publicizes its efforts in the UAE newspapers. For example, the Central Bank noted in a press release announcing a joint US/UAE seminar on Cash Courier Operations on June 10th that "The seminar was held from the standpoint of the United Arab Emirates policy to exchange experience and technologies applied in friendly countries in combating all types of financial crimes...This is evident in the AMLSCU's 331 training programs, including conferences, seminars, and workshops in relation to encountering financial crimes, particularly money laundering and terrorism financing, till date (sic)." Embassy country team assesses that the Central Bank often judges that passing laws and conducting training programs is a sufficient deterrent and makes the UAE less vulnerable to abuse by criminals and terrorist financiers. The AMLSCU does not have the capacity or expertise to fully investigate suspicious activity, and the UAE's law enforcement and prosecutorial elements are not trained or pro-active in financial crimes investigations. Even though the UAE's laws are very robust, Embassy country team assesses that the lack of enforcement of the laws makes the UAE's financial system vulnerable to abuse.

(S/NF) To date, the security services have been the main element of the UAE to investigate and take action on terfin cases; however, we have seen little evidence that they are truly engaged on this issue. Both the federal State Security Department (SSD) and Dubai's General Department of State Security (GDSS) have elements that work against the terfin target, and they are able to electronically monitor financial transactions flagged by the AMLSCU's database as suspicious. Additionally, the SSD has designated officials who work alongside the Central Bank's AMLSCU and in several of the UAE's semi-governmental charity organizations. However, Embassy country team assesses that the primary intent behind the security services' activities is to ensure individuals and entities are not instigating or fomenting political dissent.

¶10. (S) Question. Which host government organizations are responsible for implementing the legislation, and how effective is their administration and enforcement?

(S) Answer. Many elements of the UAEG are responsible for administration and oversight of the UAE's anti-money laundering and counterterror finance laws. The most visible element is the UAE Central Bank; however, it mainly issues regulations and oversees the financial sector. The Ministry of Interior and state security departments are responsible for investigating cases. The Ministry of Justice and the appropriate Attorneys General offices are responsible for coordinating any type of prosecution or legal action. The UAE's various customs authorities are responsible for implementing the cash declaration requirement, and the Ministry of Economy oversees the UAE's security and commodities market.

(C) The Central Bank Governor chairs the National Anti- Money Laundering Committee (NAMLC) that is charged with overseeing the UAE's national anti-money laundering policies and efforts. Members include the Central Bank, the Ministries of Interior, Justice, Finance, and Economy, and the Federal Customs Authority. There is also a National Counter Terrorism Committee that is comprised of officials from the Ministries of Foreign Affairs, Interior, Justice, and Defense, the SSD, the Central Bank, and the Federal Customs Authority. These two committees do not meet on a regular basis, and they appear to be more policy-making bodies, rather than action-oriented task forces.

(S) The Emiratis' clear preference for handling all types of terrorism cases (including those with a financial angle) is to deport the perpetrator, as opposed to prosecuting. As such, the most active elements of the government are the Ministry of Interior, police, and security services. The least active are the prosecutors. Embassy country team assesses that the failure to prosecute is due to a lack of capacity and experience on the part of the prosecutors, and to a lack of will in the Ministry of Justice.

¶11. (S/NF) Question. Please describe any raids or arrests of significant terrorist/insurgent finance personalities. Did those actions result in successful prosecutions, asset freezes/seizures, etc.?

(S/NF) Answer. Embassy is only aware of one terror finance related prosecution. In a January meeting, Brigadier General Mohammed Al-Qemzi, director of Dubai's General Department of State Security, told Treasury U/S Levey that Emirati national Ali Sa'id Al-Kindi had been sentenced to a seven year imprisonment for supporting the Iraqi insurgency. The courts sentenced Al-Kindi under the provisions of the 2004 Counterterror law, but Al-Qemzi noted that the case had not been made public (ref C).

(S/NF) The case of al-Qa'ida financier and Emirati national Salah Salim Mohammad Ghanim al-Shamsi has been an ongoing challenge for USG/UAEG terfin cooperation. The GDSS detained Shamsi in 2003, and he served a combined 15 months in detention. However, as Shamsi's activities pre-dated the UAE's 2004 criminalizing terrorist financing, the UAE claims it cannot prosecute him for his actions. According to the GDSS, Shamsi cannot leave the country, he has to report on a regular basis to an officer, he was forced to change his phone numbers so that his past associates cannot contact him, the license for his religious education center in Sharjah was cancelled, he cannot leave Dubai without permission of the GDSS, and he is not allowed to visit the bookstore he previously owned. GDSS chief Mohammed Al-Qemzi told Treasury U/S Stuart Levey in January 2006 that he believes the provisions of Shamsi's parole are very "strict and severe" and that Shamsi is "suffering enough" (ref C). In response to U/S Levey's recommendation to designate Shamsi in order to make an example of him, Al-Qemzi said he believed that imposing restrictions on Shamsi were more effective, because making his actions public could cause extremists to view him as a "hero."

(S/NF) The USG is aware of one case where the UAE detained three foreign nationals involved terrorist-finance activities, at the request of another government. The individuals were detained for several days, debriefed, and then deported. In this instance, the UAEG did not share the results of their investigation with the USG, and none of them were ever taken to court for prosecution.

¶12. (S) Question. Have any assets been frozen/seized under either the UNSCR 1267/1617 or 1483/1518 sanctions regime? Is host country willing and able to investigate and, if appropriate, act to freeze/seize assets based on information provided by the USG?

(S) Answer. The UAE Central Bank freezes accounts of any individual placed on the UN 1267 list. Between 2000 and 2005, the Central Bank froze seventeen accounts totaling \$1,353,170 based on the UN 1267 list. The accounts remain frozen to date. Embassy is unaware of any accounts being frozen under UNSCR 1483/1518.

(S) UAE law enforcement officials typically do not have the expertise or resources to conduct detailed financial investigations, and Central Bank officials claim that the AMLSCU cannot initiate an investigation or refer a case to law enforcement authorities unless there is evidence of illegal activity in the UAE (ref D). Although the UAE has used information from the USG to justify asset freezes, over the past two years the Central Bank has become concerned that

doing so makes it vulnerable to law suits. As such, Central Bank officials now tell us they will freeze accounts only if: a) the account holder is listed on a UN list; or b) the USG request comes through formal legal channels via the MFA or Ministry of Justice (ref E). (Note: This precondition set by the Central Bank has not yet been tested, as the USG has not requested the UAEG freeze any accounts since telling us of this new policy. End note.) Central Bank Governor al-Suweidi told Treasury U/S Stuart Levey in January that if an account holder is not designated by the UN, it is easier for the UAE to simply close accounts -- vice freezing them. ¶13. (SBU) Question. How, if at all, does host country prohibit persons located within its borders, as well as host country nationals wherever located, from providing funds and other financial assets and economic resources to UN-designated sanctions targets?

(SBU) Answer. The main way that the UAE prevents individuals from providing funds to UN-designated sanctions targets is by disseminating the list of UN-designated individuals to the financial institutions and requesting that they freeze the accounts of the designated individuals and entities.

¶14. (S) Question. Please provide a current appraisal of the host government's fulfillment of UN obligations under UNSCR 1483 to return to the Development Fund for Iraq (DFI) former regime assets located in host country.

(S) Answer. UAE authorities did not discover significant assets related to the former Iraqi regime. In July of 2003, Central Bank Governor Al-Suweidi told Econchief that during Operation Desert Storm, the Central Bank had frozen a small sum of money belonging to Iraqi Airways, but that the UAEG had not yet transferred the assets to the Development Fund for Iraq (ref F). Additionally, in April 2004, Embassy notified the UAEG that the USG intended to propose listing a UAE-based company (Al Wasl and Babel General Trading) to the UN 1518 Sanctions Committee (ref G). In the summer of 2004, the UAE froze \$43.5 million of Al Wasl and Babel's assets that the company held on behalf of the former Iraqi regime. As of late 2004, the Dubai Attorney General's Office was investigating the case, but Embassy has been unable to learn the status of the investigation. Despite multiple requests to the Central Bank, Ministry of Foreign Affairs, and Dubai Attorney General's Office, Embassy is unaware whether the UAEG repatriated these assets to the Development Fund for Iraq.

¶15. (C) Question. Has the country team demarched the host government on repatriating Iraqi assets? Has the government of Iraq demarched the host government on repatriating Iraqi assets?

(C) Answer. Embassy has demarched the UAEG a number of times regarding the repatriating of Iraqi assets, but we are not aware of the Iraqis' ever approaching the Emiratis about this issue.

¶16. (C) Question. Please describe the host country's actual oversight over the formal financial sector, alternative remittance systems and cash couriers. In particular, what is post's assessment of the host country's enforcement, if any, of laws and regulations involving cash couriers transiting their borders with Iraq?

(C) Answer. The Central Bank resoundingly claims that its laws and regulations are stringently applied and prevent "wrongdoers" from misusing the UAE. However, there are clearly gaps and vulnerabilities that terrorists and criminals can exploit. Although the Central Bank has issued guidelines to banks for what constitutes a suspicious transaction, since there is no amount that automatically triggers an STR, the reporting requirement is highly subjective (see para 10). Additionally, Embassy country team assesses that the hawala system in the UAE is extremely vulnerable. As noted in para 5, there is no mechanism in place to ensure that all hawaladars register, and there are no penalties imposed on unregistered hawaladars. Reporting indicates that individuals are exploiting this loose regulatory environment to move money into Iraq, Afghanistan,

and Pakistan via UAE hawalas; however, it is difficult to correlate this movement directly to terrorist financing.

(C) Embassy also notes that the requirement to report cash is applied very loosely. There are no signs in airports or at border crossings informing travelers of the reporting requirement, and at no point during the transit process are passengers given the declaration forms. Customs officials have told Embassy officials that they do not view the declaration system as a tool for combating money laundering, and since the UAE is a cash-based society it is not considered unusual for individuals to be carrying significant sums of money. As such, any declarations filed by travelers only create a record of the movement of the cash; the UAE authorities do not necessarily use the information to begin an investigation. In the spring of 2006, Embassy approached the UAE about conducting a joint cash courier operation targeting individuals trying to evade the cash declaration system. However, the UAE's National Anti-Money Laundering Committee has not yet given UAE customs authorities the authorization to conduct the operation.

Communication

¶17. (S/NF) Question. Does the host government regularly share terrorist/insurgent finance information with Embassy officials?

(S/NF) Answer. The UAE does share information with the USG, but only when asked. For example, in the spring of 2005, Embassy's Legatt office requested the UAE Central Bank provide certified bank records for use in the sentencing phase of Zacarias Moussaoui's trial. The Central Bank provided the requested documents in May of 2005. While the UAE has previously provided thousands of such documents for intelligence purposes, this is the first time any U.S. law enforcement agency has received certified bank records from the UAE Government for use in a judicial proceeding.

(S/NF) Embassy country team assesses that the senior levels of the UAEG assume that information sharing is more pro-active than it actually is. For example, in November of 2004 then Dubai Crown Prince (now UAE Prime Minister) Mohammed bin Rashid (MbR) briefed CENTCOM Commander General Abizaid on a Dubai-based network involved in facilitating the Iraqi insurgency in Fallujah that the GDSS had identified and disbanded (ref F). This information had not previously been shared with the USG. MbR had the GDSS chief show a linkchart with pictures, names, and details of suspected foreign nationals and Emiratis involved. In a follow-up meeting with the GDSS, the names and pictures of the Emiratis implicated had been deleted.

¶18. (SBU) Question. Does the host government regularly share terrorist/insurgent finance information with the government of Iraq?

(SBU) Answer. Embassy is unaware whether the UAEG shares terrorist/insurgent finance information with the government of Iraq.

¶19. (S/NF) Question. Please describe the host country's public affairs campaigns, if any, with respect to support for terrorist and insurgent groups in Iraq. Is such support condemned, in part or in whole or not at all? Please provide an assessment of the host country's receptivity to proactively condemning the insurgency, if it does not already do so.

(S) Answer. UAEG officials publicly and strongly condemn extremism and terrorist attacks. UAEG officials prepare, distribute, and monitor the Friday sermons delivered at mosques; anti-extremism and the condemnation of terrorism acts have been the repeated focus of these sermons. The UAE has specifically and publicly condemned acts of sectarian and terrorist violence in Iraq, such as the February 22 bombing of the al-Askariya Shrine.

(S/NF) The UAE's intelligence service is working with five other countries (Jordan, Egypt, Kuwait, Turkey, and Saudi Arabia) to support Iraqi "nationalists" to counter sectarian violence; this work is not publicized. Abu Dhabi Crown Prince Sheikh Mohammed bin Zayed Al-Nahyan has said that this "Group of Six" has been able to provide Iraqi moderates with about ten percent of the \$50-\$60 million that they require each month. Deputy PM Sheikh Hamdan bin Zayed Al-Nahyan has suggested that there be a "collective effort" to support the Shi'a groups from the south by assisting them to establish radio and television stations (ref H).

Background Information

¶20. (S/NF) A body of reporting indicates that financiers use the UAE to raise funds for the Iraqi insurgency, but Embassy does not have a clear picture of the mechanism for how the funds are raised or the individuals involved. Anecdotal reporting suggests that some money is collected from wealthy patrons and that other funds are generated via trade-based money laundering. Additional reporting has identified instances where money was sent via courier, hawala, and formal financial institutions. Although Embassy is concerned that some charities in the UAE are wittingly or unwittingly being used by extremist organizations, we do not have any reporting that indicates UAE charities are being used to funnel money into the Iraqi insurgency.

¶21. (S) Approximately 40,000 Iraqis reside in the UAE, an unknown number of whom are former members of the IIS, GDS, and the Ba'ath Party. We have no concrete information on how many former regime members reside in the UAE, or whether they are engaged in supporting the insurgency. The one exception is former IIS officer, Khalaf Al-Dulaymi, who is designated under UNSCR 1483 and whose family resides in Dubai. During the January meeting of the Joint Terrorist Finance Task Force (JTFFC), Treasury U/S Stuart Levey passed Central Bank Governor Sultan Nasser Al-Suweidi the names of Al-Dulaymi's family members. U/S Levey passed the same list to GDSS Chief Mohammed Al-Qemzi the next day. (Note: Embassy does not know what actions, if any, the UAE has taken against Khalaf Al-Dulaymi and his family. End note.)

¶22. (S) During the JTFFC meeting, Governor Al-Suweidi stated that the Central Bank was in the process of responding to FinCEN requests for information on Iraq insurgency members with bank accounts in the UAE (ref C). He noted that the Central Bank is willing to freeze accounts of individuals designated by the UN, but he did not specify whether the Central Bank had frozen the accounts of any former regime members. He also stated that the UAE was willing to "watch" any individuals the USG is concerned might be connected to the Iraqi insurgency, and he requested that the USG provide the UAE with names.

Comment

¶23. (SBU) Electronic copies of the Counterterrorism Law, Anti-Money Laundering Law, and Administrative Regulation No. 24/2000 will be sent via email to Katherine Leahy in EB/ESC/TFS and James Hunter in NEA/I. SISON